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Sam A. Schmidt, Esq.

October 28, 2024

The Hon. Analisa Torres
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Mustafa Kamel Mustafa,
04 Cr. 356 (AT)

Dear Judge Torres:

As Your Honor is aware, I, along with Michael Bachrach, Esq., represent Defendant Mustafa Kamel Mustafa a/k/a Mostafa Kamel Mostafa in relation to Mr. Mostafa's motion for compassionate release and/or reduction in sentence. Defendant's motion was filed on December 15, 2023 (Doc. No. 615), and the Government filed its response on April 17, 2024 (Doc. No. 623). Your Honor granted consent requests for continuances to file our reply brief which is presently due on October 31, 2024.

As your Honor is aware, because Mr. Mostafa is held in isolation in Florence ADX under a S.A.M., communication with him is difficult and correspondence is rerouted for examination. Our "final" draft was sent to Mr. Moustafa four weeks ago. The earliest we were able to schedule a call with him is October 31, 2024. Additionally, after we received the rest of the film relating to Mr. Mostafa's teeth, we learned that our expert was out of the country. He returns on November 4, 2024. Therefore we are requesting that the reply be due by November 15, 2024.

We have spoken with Assistant United States Attorney Alexander Li who has informed us that the Government has no objection to the instant request.

Accordingly, Defendant Mostafa Kamel Mostafa, by and through counsel, respectfully requests that his reply brief in support of his motion for compassionate release and/or reduction in sentence be filed no later than November 15, 2024.

Thank you for your Honor's time and consideration.

Respectfully submitted,

/s/

Sam A. Schmidt, Esq.

Attorney for Mustafa Kamel Mustafa

cc: All parties of record (by ECF)
Mostafa Kamel Mostafa (by USPS mail)

GRANTED.

SO ORDERED.

Dated: October 29, 2024
New York, New York



ANALISA TORRES
United States District Judge